

Justin K. Tabayoyon Esq., SBN 288957
LAW OFFICES OF JUSTIN KIRK TABAYOYON
1000 North Texas Street, Suite A
Fairfield, CA 94533
Telephone: (707) 726-6009
Facsimile: (707) 312-8790
Email: justin@tabayoyonlaw.com

Attorneys for Plaintiffs
RICHARD WADE and SAVANNAH CHAMPION

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

RICHARD WADE, and SAVANNAH
CHAMPION

Plaintiffs,

v.

CITY OF VACAVILLE, RALPH
VALLIMONT, CHRIS LECHUGA, JEREMY
JOHNSON, WILLIAM BOEHM, TREVOR
CHAMPION, SABRINA CHAMPION,
JACKIE CHAMPION, and DOES 1 to 100,
inclusive.

Defendants.

Case No. 2:20-cv-01965-TLN-KJN

**STIPULATION AND ORDER TO EXTEND
PLAINTIFFS TIME TO FILE A THIRD
AMENDED COMPLAINT**

IT IS HEREBY STIPULATED by and between the parties hereto, through their respective attorneys, that plaintiffs RICHARD WADE and SAVANNAH CHAMPION (hereinafter, "plaintiffs") may have up to and including April 27, 2022, to file a third amended complaint.

The order filed on March 9, 2022, gives plaintiffs 30 days to file a third amended complaint. Plaintiffs retained Mr. Tabayoyon on March 18, 2022, to file a third amended complaint on their behalf. Given the change in counsel, additional time is needed to prepare and file the third amended complaint.

Therefore, the parties agreed that plaintiffs' counsel shall have up to and including April 27, 2022, to file a third amended complaint.

Pursuant to Local Rule 6-1(a), “Unless the filing date has been set by order of the Court, an initial stipulation extending time for no more than twenty-eight (28) days to respond to a complaint . . . may be filed without approval of the Court if the stipulation is signed on behalf of all parties who have appeared in the action and are affected by the stipulation. All other extensions of time must be approved by the Court. No open extensions of time by stipulation of the parties will be recognized.”

Good cause exists for the requested extension considering plaintiffs change in counsel and the additional time that is needed to prepare and file a third amended complaint.

NOW, THEREFORE, the parties hereby submit this stipulated request that the last day for plaintiffs to file a third amended complaint be continued to April 27, 2022.

IT IS SO STIPULATED.

Dated: (As Authorized on 3/28/2022)

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

By: /s/ Richard W. Osman

Richard W. Osman

Sheila D. Crawford

Attorneys for Defendants

RALPH VALLIMONT, CHRIS LECHUGA,

JEREMY JOHNSON, WILLIAM BOEHM, et al.

Dated: 3/28/2022

LAW OFFICES OF JUSTIN K. TABAYOYON

By: /s/ Justin Kirk Tabayoyon

Justin K. Tabayoyon, Esq.

Attorneys for Plaintiffs

RICHARD WADE and SAVANNAH

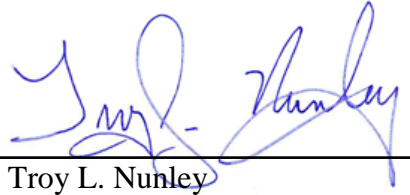
CHAMPION

ORDER

Pursuant to the parties' stipulation, and good cause appearing, plaintiffs deadline to file a third amended complaint is continued to April 27, 2022.

IT IS SO ORDERED.

DATED; March 30, 2022



Troy L. Nunley
United States District Judge